

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

----- X
UNITED STATES OF AMERICA :
 :
- v. - :
CHRISTOPHER ANSAH, :
 :
Defendant. :
----- X

INDICTMENT

19 Cr.

19 CRM 752

COUNT ONE

(Conspiracy to Export, Transport, and Possess Stolen Motor Vehicles)

The Grand Jury charges:

1. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree together and with each other to commit offenses against the United States, to wit, the exportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 553(a)(1), the transportation of stolen motor vehicles, in violation of Title 18, United States Code, Section 2312, and the possession of stolen motor vehicles, in violation of Title 18 United States Code, Section 2313.

2. It was a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown,

would and did knowingly export and attempt to export motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 553(a)(1).

3. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did transport, in interstate and foreign commerce, motor vehicles, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2312.

4. It was further a part and object of the conspiracy that CHRISTOPHER ANSAH, the defendant, and others known and unknown, would and did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, in violation of Title 18, United States Code, Section 2313.

Overt Acts

5. In furtherance of the conspiracy and to effect the illegal objects thereof, CHRISTOPHER ANSAH, the defendant, committed the following overt acts, among others, in the Southern District of New York and elsewhere:

a. On or about May 14, 2018, ANSAH loaded stolen motor vehicles, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

b. On or about November 2, 2018, ANSAH oversaw the loading of a stolen motor vehicle, which had crossed State boundaries after being stolen, into a shipping container that was subsequently taken to a seaport for transportation to West Africa.

(Title 18, United States Code, Section 371.)

COUNT TWO

(Exportation of Stolen Motor Vehicles)

The Grand Jury further charges:

6. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did export and attempt to export motor vehicles, knowing the same to have been stolen, to wit, ANSAH exported and attempted to export stolen cars by placing them in shipping containers bound for West Africa.

(Title 18, United States Code, Sections 553(a)(1) and 2.)

COUNT THREE

(Transportation of Stolen Motor Vehicles)

The Grand Jury further charges:

7. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did transport in interstate and foreign commerce motor vehicles,

knowing the same to have been stolen, to wit, ANSAH transported and aided and abetted the transportation of stolen motor vehicles from the Bronx to New Jersey, which motor vehicles were bound for West Africa.

(Title 18, United States Code, Sections 2312 and 2.)

COUNT FOUR

(Possession of Stolen Motor Vehicles)

The Grand Jury further charges:

8. From at least in or about May 2018 up to and including at least in or about December 2018, in the Southern District of New York and elsewhere, CHRISTOPHER ANSAH, the defendant, did receive, possess, conceal, store, barter, sell, and dispose of motor vehicles which had crossed State boundaries after having been stolen, knowing the same to have been stolen, to wit, ANSAH received and possessed in New York State motor vehicles stolen from outside New York State and stored or concealed them in shipping containers bound for West Africa, knowing those vehicles were stolen.

(Title 18, United States Code, Sections 2313 and 2.)

FORFEITURE ALLEGATIONS

9. As a result of committing the offenses alleged in Counts One, Three, and Four of this Indictment, CHRISTOPHER ANSAH, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(C)

and 982(a)(5), and Title 28, United States Code, Section 2461(c), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offenses, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

10. As a result of committing the offense alleged in Count Two of this Indictment, CHRISTOPHER ANSAH, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 981(a)(1)(F) and 982(a)(5), and Title 28, United States Code, Section 2461(c), any and all property constituting, or derived from, proceeds the defendant obtained directly or indirectly, as a result of the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Asset Provision

11. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;

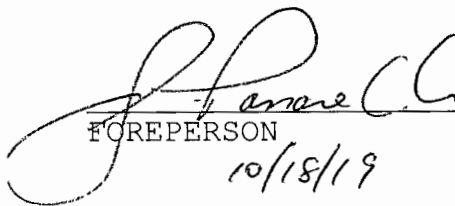
c. has been placed beyond the jurisdiction of the court;

d. has been substantially diminished in value; or

e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Sections 981 and 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)


FOREPERSON
10/18/19


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

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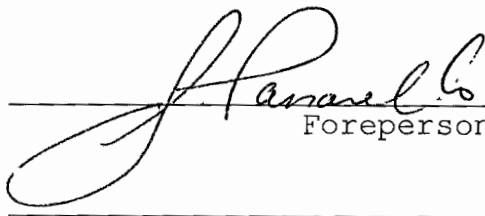
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(18 U.S.C. §§ 371, 553(a)(1), 2312,
2313, and 2.)

GEOFFREY S. BERMAN

United States Attorney

 10/18/19
Foreperson

KU
10/18/19

Filed Indictment
case assigned to Judge Furman

Stewart A. Aron
U.S.M.J.